PERSONAL DATA PROCESSING POLICY

1. General Provisions

1.1   SWI Inc. (hereinafter referred to as the Operator) considers the observance of the rights and freedoms of the citizens to be one of the essential conditions for implementing its activity.
1.2   The Operator's Policy on the processing of Personal data (hereinafter referred to as the Policy) applies to all information that the Operator can gain about visitors to the Site.
1.3. The Operator performs the cross-border transfer of each User's Personal data, taking whatever measures are necessary for their protection.

2. Key Terms and Concepts Used in the Policy:

2.1   Site – a set of graphic and information materials, as well as the computer programs and databases, enabling their availability on the Internet at the following web-address: http://skyway.capital/;
2.2   User – any visitor of the Site;
2.3   Personal data – any information related to the User of the Site;
2.4   Personal data processing - any action with Personal data done using computers, as well as without using them;
2.5   Anonymization of Personal data – actions that result in the inability to determine the ownership of Personal data to a particular User or person without the use of additional information;
2.6   Dissemination of Personal data – any actions that result in the disclosure of Personal data to an indefinite number of persons;
2.7   Provision of Personal data – any actions which result into disclosure of Personal data to certain number of people;
2.8   Destruction of personal data – any actions that lead to irretrievable destruction of Personal data on computers or any other carriers.

3. The Operator Can Process the Following Personal Data:

#	Personal Data	Procedure for Using
3.1	Name	to identify the User
3.2	Phone Number	is used for notifications and security confirmation
3.3	E-mail address	is used for notifications and information, for system entry
3.4	IP-address	security (login history)
3.5	Language	for communication with the User in his/her language
3.6	Internal ID of the User	for identifying the User in the system

#	Personal Data	Procedure for Using
3.7	Date of registration	is used for maintenance of statistics
3.8	Check indicator	for internal use
3.9	Status	system status identifying the engagement rate
3.10	Inviter's first and last name	(if any) is used for referral structure
3.11	Citizenship	for statistics
3.12	Country	for statistics
3.13	City	for statistics
3.14	Date of birth	for verification
3.15	Country of birth	for verification
3.16	Sex	for verification
3.17	Scanned copy/photo of the passport	for verification
3.18	Address	for verification
3.20	Confirmation of the address	for verification
3.21	Additional phone number	at the User's wishes
3.22	Additional address	at the Operator's request
3.23	Skype installation data	at the User's wishes
3.24	Client's current address	for delivery of certificates, requested by the Operator if different from verification address
3.25	Confirmation of parental rights	for making investments for children
3.26	Additional E-mail address	at the User's wishes

3.27 There also occurs the collection and processing of the anonymized data about the visitors (including "cookie" files), using the web statistics services (Yandex.Metrica and Google Analytics and others).

4. Purpose of the Personal Data Processing

4. The purpose of the User's Personal data processing is the information interaction with the User for concluding the User Agreement, Client Agreement, as well as the other agreements, where the User is represented as the party; however, the Personal data is not distributed, neither it is provided to third

parties without the User's consent and is used by the Operator exclusively for conducting the specified transactions (agreements) and making the transaction (agreements) with the User.

The Operator also has the right under the User Agreement to send notifications to the User about new products and services, special offers and various events. The User can always refuse to receive informational messages by sending a letter to the Operator at PrivacyPolicy@skyway.capital or the Information Security Officer at dpo@skyway.capital.

4.2 Anonymized data of the Users, collected using web statistics services, is used to collect information about the actions of the Users on the Site, improve the quality of the Site and its content.

5. Legal Grounds for the Personal Data Processing

5.1 The Operator processes the Personal data of the User only if it is sent by the User through the forms on the Site. By submitting their Personal Data to the Operator, the User agrees with this Policy.

5.2 The Operator processes anonymized User's data if it is allowed in the User's browser settings (includes file retention and JavaScript technology).

6. Procedure for Collection, Storage, Transfer and Other Types of Personal Data Processing

6.1 The Operator ensures the safety of Personal data and takes all possible measures to exclude access to the Personal data of unauthorized persons.

6.2 The Operator has the right to entrust the processing of Personal data to a third party with the consent of the User.

6.3 The third party, processing Personal data at the request of the Operator must comply with the principles and rules for processing Personal data provided by the Personal Data Act, ensuring the confidentiality and security of Personal data when processing it. The Operator monitors compliance with the Regulation # 2016/679 of the European Parliament and the Council of the European Union "On the Protection of Individuals in Personal Data Processing and Free Circulation of Such Data, as Well as the Repeal of Directive 95/46 / EC (General Protection Regulation of Personal Data)".

6.4 If inaccuracies are detected in Personal data, the User can actualize them by sending a notification to the Operator's e-mail PrivacyPolicy@skyway.capital, or to the Information Security Officer at dpo@skyway.capital, marked "Actualization of Personal Data"

6.5 The Personal data processing period is unlimited. The User can withdraw his consent to the processing of Personal data by sending a notification to the Operator at any time via e-mail to the Operator's email address PrivacyPolicy@skyway.capital or to the Information Security Officer at dpo@skyway.capital, marked ("Revocation of Consent to the Processing of Personal Data."

7 Final Provisions

7.1 The User can receive any clarifications on issues of interest related to the processing of their Personal data by contacting the Operator via e-mail PrivacyPolicy@skyway.capital or the Information Security Officer at dpo@skyway.capital.

7.2 This document will reflect any changes in the Operator's Personal data processing Policy. In case of significant changes, the User can be sent information to the email address specified by him/her.